

# **EXHIBIT 150**

12/3/2024

Richard Kadrey, et al. v. Meta Platforms, Inc.  
Highly Confidential - Attorneys' Eyes Only

Hugo Touvron

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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RICHARD KADREY, et al., :

Plaintiffs, :

v. :

Case No.: 3:23-CV-03417-VC

META PLATFORMS, INC., :

Defendant. :

-----x

HIGHLY CONFIDENTIAL, ATTORNEYS' EYES ONLY

Videotaped Deposition of

HUGO TOUVRON

Tuesday, December 3, 2024

10:06 a.m. GST

London, England

Reported by: Cassidy Western, RPR, CRR

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DIGITAL EVIDENCE GROUP

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1 Videotaped Deposition of HUGO TOUVRON, held

2 at the offices of:

3

4 Cooley LLP

5 22 Bishopsgate

6 London, UK EC2N 4BQ

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12 Pursuant to notice, before Cassidy Western,

13 RPR, CRR, Notary Public in and for the

14 Commonwealth of Pennsylvania.

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1 post-training that I should have that.

2 MR. SIMONS: Okay. We again request for  
3 the record copies of the post-training that  
4 contains these templated answers as they have not  
5 been produced.

6 BY MR. SIMONS:

7 Q If you go to the bottom --

8 A Uh-huh.

9 Q -- of page 3, there's a question that  
10 says:

11 Are you trained on Library Genesis?

12 And the answer is:

13 No, I'm not trained on Library Genesis  
14 or any other sources that provide illegally  
15 obtained or pirated content, including books,  
16 articles or websites.

17 Do you see that?

18 A Yeah.

19 Q Now, as we discussed earlier --

20 A Yeah.

21 Q -- LLaMA 3 is, in fact, trained on  
22 Library Genesis. Right?

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1           A       Yeah, it's trained on -- we refer -- I  
2       don't know if it's a word in Library Genesis. But  
3       there's a dataset that we train on in Library  
4       Genesis and we refer to it as LibGen.

5           Q       So this answer is not true. Right?

6           A       I'm not 100 percent sure, but yeah, I  
7       don't think it's true.

8           Q       And if it was a templated answer, do you  
9       know why Meta --

10          A       But I will say it's not true for the  
11       Genesis part.

12          Q       Right. With respect to training on  
13       the -- and that's a question that it seems like  
14       Meta was aware of because as we were looking at  
15       earlier, that was the issue that Melanie raised,  
16       right, when we were looking at those messages  
17       earlier is that it would say, I am, you know,  
18       trained on Library Genesis.

19                 So is it your understanding that someone  
20       at Meta created a templated answer that provides  
21       inaccurate information if someone was to ask about  
22       training for Library Genesis?

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1 CERTIFICATE OF SHORTHAND REPORTER - NOTARY PUBLIC

2 I, CASSIDY WESTERN, RPR, CRR, the officer  
3 before whom the foregoing deposition was taken, do  
4 hereby certify that the foregoing transcript is a  
5 true and correct record of the testimony given;  
6 that said testimony was taken by me  
7 stenographically and thereafter reduced to  
8 typewriting under my direction; that reading and  
9 signing was requested; and that I am neither  
10 counsel for, related to, nor employed by any of  
11 the parties to this case and have no interest,  
12 financial or otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto set  
14 my hand this 6th day of December, 2024.

15 My commission expires August 4, 2025.

16

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12/6/24

21 Cassidy Western, RPR, CRR

Date

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